

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

KAREN NASH, M.D.,)
vs. Plaintiff,) No. 08CV3648
COUNTY OF COOK,) JUDGE ZAGEL
Defendant.) MAGISTRATE JUDGE MASON

MOTION TO TRANSFER CASE

NOW COMES the Plaintiff, KAREN NASH, M.D., by and through her attorney, Linda C. Chatman of Marcus, Boxerman & Chatman, LLP, and in support of her Motion to Transfer Case, states as follows:

1. Plaintiff's original complaint was filed within another complaint, which also contained Plaintiffs Vietta Johnson, M.D., Daniel Ivankovich, M.D. (Case No. 08 C 2139 before Judge Ruben Castillo.)

2. At the June 11, 2008 hearing on Defendant's Motion to Dismiss that complaint, it was decided that Plaintiff Karen Nash, M.D.'s complaint should be separated from Dr. Johnson's and Daniel Ivankovich's, which would remain combined.

3. While Dr. Nash's allegations are not inextricably linked to Dr. Johnson's and Dr. Ivankovich's, excluding their constitutional claims, her allegations are virtually identical to theirs; they both have race and sex discrimination claims against County of Cook with virtually identical players and witnesses.

4. Plaintiff's counsel and Defendants' Counsel are the

same for both cases and Defendants' counsel has voiced agreement to this motion.

5. Prior to separation of the cases, this matter was set for a settlement conference with Judge Castillo on July 22, 2008.

6. It would be a more efficient use of judicial resources to have these cases heard by the same Judge.

WHEREFORE, Plaintiff, Karen Nash, M.D., now moves for this honorable Court to transfer her case back before Judge Ruben Castillo

Respectfully submitted,

s/LINDA CARROL CHATMAN
One of the Attorneys for Plaintiff

Linda C. Chatman
MARCUS, BOXERMAN & CHATMAN, LLP
19 S. LaSalle Suite 1500
Chicago, Illinois 60603
312-917-1005

CERTIFICATE OF SERVICE

I, Linda C. Chatman, hereby certify that I served a copy of the foregoing by mailing a copy of the same to the Defendant's attorney by depositing same in the U.S. Mail at 19 S. LaSalle, Chicago IL 60603, before 5:00 p.m. on July 10, 2008 and by filing a copy electronically with the Clerk of the Court.

s/LINDA CARROL CHATMAN
Linda Carrol Chatman